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Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing
and Urban Development
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2502-0608
(exp.02/28/2017)

1a. Grantee Name & Address (including City, County, State, Zip Code, Telephone No. & email address)

Maryland Department of Housing and Community Development
100 Community Place, Crownsville, MD 21032
Attn: Elaine Cornick 410-514-7449 Elaine.Cornick@Maryland.gov

1b. Rental Assistance Contract Number

MD06RDD1201

1c. No. of Units

150

1d. Entity Responsible for conducting Outreach and Referral (check all that apply)

☐

Grantee

☐

Service Provider

☒

Other (specify)

Maryland Department of Disabilities

Entity Name, Contact Person and Position (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address

John Brennan, Chief of Staff
Maryland Department of Disabilities
217 E Redwood St, Baltimore, MD 21202
410-767-3640 john.brennan@maryland.gov

1e. If the outreach is performed by any other entity other than the Grantee, explain how the Grantee will monitor their activities to ensure compliance with affirmative fair housing outreach requirements. Enter "N/A" in the field below if not applicable.

The Grantee has designated the Maryland Department of Disabilities (MDOD) as the primary conduit for outreach and referral for the MD Section 811 PRA Program. In order to reach as many eligible persons as possible, MDOD will coordinate with a broad range of entities who work directly with the target populations. MDOD will serve as a clearing house for various entities that may refer potential tenants. Outreach and referral to potentially eligible persons will be provided through regular case manager to client contact, Money Follows the Person (MFP) outreach efforts in institutions and program informational materials distributed to Centers for Independent Living (CILs), advocacy organizations, consumer groups, service providers and other health care organizations. Program information and outreach activities will include information about eligibility criteria and instructions for enrollment procedures. All eligible applicants must be enrolled in the program by their case manager or by CIL staff. In addition to fair housing training, case managers for all service programs and CIL staff will receive training in PRA Demo program requirements, enrollment procedures, unit application processes, transition planning and person-centered planning for community-based housing.

1f. To whom in the Grantee's office should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.

Maryland Department of Housing and Community Development
100 Community Place, Crownsville, MD 21032
Attn: Elaine Cornick 410-514-7449 Elaine.Cornick@Maryland.gov

2a. Affirmative Fair Housing Marketing Plan

Plan Type

Initial Plan

Date of the First Approved AFHMP:

Reason(s) for current update:

2b. Outreach Start Date

Grantees should not begin accepting applications prior to conducting the marketing and outreach activities identified in the approved AFHMP.

Date Outreach will begin (xx/xx/xxxx)

Date Grantee will begin accepting applications (xx/xx/xxxx)

Note: Only Fiscal Year 12 Demonstration Grantees are permitted to accept applications prior to conducting marketing and outreach activities identified in the approved AFHMP.

3a. Target Areas (check one): ☐ Statewide ☒ Other (specify)

Baltimore, Washington DC and the surrounding areas

3b. Target Population(s)

The target populations for the MD PRA Demo are non-elderly adults with disabilities, age 18 and over and below 62 years of age at selection, with income at or below 30% of AMI who are Medicaid recipients. In order to ensure the state's priority policy issues - including meeting Olmstead requirements and ending homelessness - are addressed, the MD PRA Advisory Committee determined that certain populations would have a priority for the PRA Demo units. These households would be prioritized on the centralized referral list. These Priority Populations are, in priority order:

1. Institutionalized Medicaid Recipients
2. Households At Risk of Institutionalization Due to Current Housing Situation
3. Developmental Disabilities Administration (DDA) Community Pathways Waiver Participants Moving from Group Homes/Alternative Living Units (ALUs) to independent renting and Mental Hygiene Administration (MHA) Residential Rehabilitation Program participants moving to independent renting, and
4. Homeless persons who are Medicaid recipients, prioritized in HEARTH Act definition order (HEARTH Act of 2009)

3c. Is all or some of the Target Population(s) covered by a Settlement Agreement? No ☒ Yes ☐

3d. Demographics of Target Population(s)

(check all that apply)

- ☒ White ☒ American Indian or Alaska Native ☒ Asian ☒ Black or African American
- ☒ Native Hawaiian or Other Pacific Islander ☒ Hispanic or Latino
- ☐ Families with Children (under age 18) ☒ Other ethnic group, religion, sex, etc. (specify)

3e. Data Source(s) used to obtain the demographic characteristics.

Demographic data was provided by the MD Department of Health and Mental Health, MD Developmental Disabilities Administration, MD Mental Hygiene Agency and Baltimore Health Care for the Homeless.

4a. Identify the demographic group in the target population(s) that are least likely to apply.

The Grantee has identified the following groups as least likely to apply:

- Persons whose disability impacts their ability to communicate
- Persons with limited English proficiency
- People with visual disabilities

4b. For each demographic group in the target population(s) that are least likely to apply, provide a description of how the program will be marketed to eligible individuals in the target population(s).

The Grantee's outreach plan ensures that these populations will be reached and have an equal opportunity to apply for the S. 811 PRA Program.

Limited English Proficiency: Outreach materials will be provided in Spanish, the language that has been identified as most common among the target populations. Materials will be translated into other languages as need is identified by outreach staff. Interpreters will also be provided as needed.

Persons with Communication Barriers: Based on the target populations' demographic data, it is expected that persons whose disability interferes with their ability to communicate are largely located in nursing facilities. Outreach to this population will be conducted through the MFP Program. These individuals will be identified using the state's Minimum Data Set (MDS) for nursing facilities. The MFP Program has committed to identifying persons who have difficulty communicating and making special outreach efforts to this population, using assistive technology as needed. The Maryland Technology Assistance Program's (MTAP) Device Library includes items for hearing, vision, education, communication, computer access, cognitive learning, aids for daily living, memory aids, and environmental adaptations. Click here to see our online inventory. These devices will be made available as needed by applicants.

Persons with Visual Disabilities: Programs such as the PRA Program tend to use flyers, brochures and other written materials to conduct outreach. These methods are not always equally effective for people with visual disabilities. In order to ensure this population is reached, the program will ensure outreach is conducted to reach this population including through materials provided in alternative formats. The MTAP will produce materials in alternative formats as requested by MD DOD. In addition, MFP will use the MDS data to identify persons with visual disabilities who desire to move into the community and will ensure there is individual phone or face-to-face contact with these individuals.

5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices/locations in which rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

☒ Rental Office ☒ Grantee Office ☐ Model Unit ☒ Other (specify)

5b. Affirmative Fair Housing Marketing Plan

The AFHMP must be available for public inspection at all rental offices/locations (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

☒ Rental Office ☒ Grantee Office ☐ Model Unit ☐ Other (specify)

5c. Project Owner Compliance to display Fair Housing Poster and the AFHMP

Explain how you will ensure that every project owner will prominently display the Fair Housing Poster and AFHMP.

DHCD will ensure that the properties with PRA units display the fair housing poster at their sites. DHCD will reinforce this requirement in manager training and check for compliance during on-site review.

6. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your outreach activities have been successful in attracting individuals in the target population(s) who are least likely to apply, including who will be responsible for conducting this evaluation, when this evaluation will be conducted and how the results of this evaluation will inform future marketing activities.

One year from the date the Cooperative Agreement is signed, the MDOD will evaluate the success of this outreach and marketing plan. MDOD will evaluate the demographic characteristics of program applicants and tenants at that time and compare these data with the baseline demographic data on file. If this review indicates that populations identified as least likely to apply – or other populations – are not represented in the applicant and tenant populations in percentages roughly equivalent to those in the baseline data, then MDOD will assume adjustments need to be made to the outreach plan. At that point, MDOD will establish an ad hoc committee of appropriate parties to discuss the outcomes and identify potential system changes to achieve better results.

7. Additional Considerations. Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to eligible persons in the target population(s) who are least likely to apply for the program? Please attach additional sheets, as needed.

8. Review and Update

By signing this form, the grantee agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 8 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). The Grantee also certifies that training will be provided to staff/entities that provide outreach to target population(s) for the purpose of enrollment in the 811 PRA program. Training will consist of affirmative fair housing outreach requirements and the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act and the American with Disabilities Act. I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Elaine Cornick

11/14/2014

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

Elaine Cornick

Name (type or print)

Acting Director of Multifamily Housing (Maryland Department of Housing and Community Development)

Title & Name of Company

For HUD-Office of Housing Use Only

Reviewing Official:

Signature & Date (mm/dd/yyyy)

Name
(type or print)

Name

Title

For HUD-Office of Fair Housing and Equal Opportunity Use Only

☐ Approval

☐ Disapproval

Signature & Date (mm/dd/yyyy)

Name
(type or print)

Title